

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA  
MARTINSBURG**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CRIMINAL CASE NO.: 3:20-mj-00127**

**TIMOTHY JOHN WATSON,**

**Defendant.**

**MOTION FOR DISCOVERY**

Comes now the citizen accused, by counsel, S. Andrew Arnold, Esquire, and moves this Honorable Court to order the Government to disclose to the Defendant any and all information it has, including but not limited to statements by the Defendant, whether written or oral; Defendant's prior record, if any; documents or tangible objects; reports of examinations or tests; a list of any witnesses the Government intends to call in its case in chief, including their addresses; all police reports and exculpatory evidence; Defendant requests notice of the Government's intention to use, in its evidence in chief at trial, any evidence which the Defendant may be entitled to discover and the Defendant requests trial by jury.

**TIMOTHY JOHN WATSON**

By Counsel

**/s/S. Andrew Arnold**

S. Andrew Arnold, Esq. (WV#6131)

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**CERTIFICATE OF SERVICE**

I, S. Andrew Arnold, Esquire, hereby certify that I have served a copy of the foregoing MOTION FOR DISCOVERY upon the following counsel electronically via CM/ECF, this the 3<sup>rd</sup> day of November 2020.

U.S. Attorney's Office – Mrt.  
U.S. Courthouse  
217 W. King Street, Suite 400  
Martinsburg, WV 25401

**/s/S. Andrew Arnold**  
S. Andrew Arnold, Esquire